

# INMAN TOURGEE & WILLIAMSON

ATTORNEYS AT LAW

1193 TIOGUE AVENUE  
COVENTRY, RHODE ISLAND 02816

TELEPHONE:  
(401) 823-9200

FAX:  
(401) 823-9278

WEB SITE:  
ITWLAW.COM

GREGORY S. INMAN  
MARK D. TOURGEE  
TIMOTHY A. WILLIAMSON  
JOHN T. KAVENY  
TARA L. FONTAINE  
JAMES A. FORCIER\*

\* also admitted in Massachusetts

January 11, 2012

Ms Luly Massaro, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

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PUBLIC UTILITIES COMMISSION

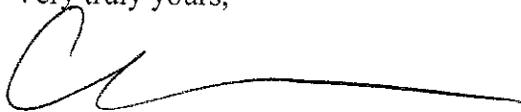
RE: *The Narragansett Electric Co. d/b/a National Grid v. West Warwick, et al*

Dear Ms Massaro:

Please find enclosed my Entry of Appearance on behalf of the Town of West Warwick along with an original answer and nine copies of the Town of West Warwick's response to National Grid's Petition for Review under Rhode Island General Law 39-1-30.

Should you have any questions regarding same, please feel free to contact me at your convenience.

Very truly yours,



Timothy A. Williamson, Esq.

TAW/eb  
Enclosure

cc: Leo Wold, Esq.  
Cindy Wilson Frias, Esq.  
John Spirito, Jr., Esq.  
Peter Lacouture, Esq.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a NATIONAL GRID

VS.

THE TOWN OF WEST WARWICK;  
ANGELO A. PADULA, JR.; DAVID  
GOSSELIN, JR.; EDWARD GIROUX;  
FILOMENA GUSTAFSON; and MARK  
BOURGET in their official capacities as  
members of the West Warwick Town  
Council

**ANSWER**

1. Defendant Town of West Warwick can neither admit nor deny the statements in Paragraph 1 of the Plaintiff's Petition as there are no allegations.

**JURISDICTION AND FACTS**

2. Defendant admits the allegations as set for in Paragraph 2 of Plaintiff's Petition.

3. Your Defendant can neither admit nor deny the allegations as set forth in Paragraph 3 of the Plaintiff's Petition and leaves petitioner to its proof.

4. Defendant admits the allegations as set for in Paragraph 4 of Plaintiff's Petition.

5. Defendant admits the allegations as set for in Paragraph 5 of Plaintiff's Petition.

6. Defendant admits the allegations as set for in Paragraph 6 of Plaintiff's Petition.

7. Defendant admits the allegations as set for in Paragraph 7 of Plaintiff's Petition.

8. Defendant admits the allegations as set for in Paragraph 8 of Plaintiff's Petition.

9. Defendant admits the allegations as set for in Paragraph 9 of Plaintiff's Petition.

10. Defendant denies the allegations as set for in Paragraph 10 of Plaintiff's Petition.

**LEGAL CLAIMS**

11. Defendant denies the allegations as set for in Paragraph 11 of Plaintiff's Petition.

12. Defendant denies the allegations as set for in Paragraph 12 of Plaintiff's Petition.
13. Defendant denies the allegations as set for in Paragraph 13 of Plaintiff's Petition.
14. Defendant admits the allegations as set for in Paragraph 14 of Plaintiff's Petition.
15. Defendant denies the allegations as set for in Paragraph 15 of Plaintiff's Petition.
16. Defendant denies the allegations as set for in Paragraph 16 of Plaintiff's Petition.
17. Defendant denies the allegations as set for in Paragraph 17 of Plaintiff's Petition.

**AFFIRMATIVE DEFENSES**

1. There is a lack of subject matter jurisdiction.
2. There is a lack of personal jurisdiction.
3. This matter has been brought to the improper venue.
4. Plaintiff has failed to state a claim upon which the relief sought can be granted;
5. Plaintiff has failed to make sufficient process;
6. Plaintiff has failed to state a claim where such relief can be granted.
7. Plaintiff has failed to join an indispensable party.

**WHEREFORE**, your Defendant moves that this Honorable Court dismiss and deny the Plaintiff's Petition and award to your Defendant all reasonable attorney's fees and costs for the litigation of this matter.



Timothy A. Williamson, Esq. #4173  
Inman, Tourgee & Williamson  
1193 Tiogue Avenue  
Coventry, RI 02816  
(401)823-9200  
(401)823-9278 – fax

CERTIFICATION

I, the undersigned, do hereby certify that I mailed a true copy of the within *Answer* via regular mail, postage prepaid, on the 11<sup>th</sup> day of January, 2013, to:

Peter Lacouture  
One Financial Plaza, Suite 1430  
Providence, RI 02903-2485

Leo Wold, Esq.  
Assistant Attorney General  
150 South Main Street  
Providence, RI 02903

Cindy Wilson Frias, Esq.  
Patricia Lucarelli, Esq.  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

John Spirito, Jr., Esq.  
Chief of Legal Services  
Rhode Island Division of Public Utilities  
89 Jefferson Boulevard  
Warwick, RI 02888

  
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

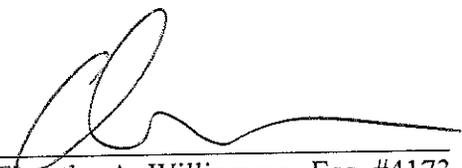
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FILOMENA GUSTAFSON; and MARK  
BOURGET in their official capacities as  
members of the West Warwick Town  
Council

**ENTRY OF APPEARANCE**

I, Timothy A. Williamson, Esq., do hereby enter my appearance on behalf of the  
Town of West Warwick.



---

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